

UNITED STATES OF AMERICA  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 )  
V. ) No. 15-cr-10149-RWZ  
 )  
ILEANA VALDEZ )

**DEFENDANT'S MOTION FOR PERMISSION TO TRAVEL**

The defendant, Ileana Valdez, moves this Court for the entry of an Order permitting her to travel to the Dominican Republic from Sunday, February 18 until Wednesday, February 28, 2018. As grounds for this Motion, the defendant states the following:

Ms. Valdez was sentenced by this Court on January 24, 2018 to 40 months of incarceration, with credit for the time she had already served. She will self-report to the Institution on the morning of March 5, 2018.

Ms. Valdez seeks permission from this Court to travel to the Dominican Republic from February 18 until February 28, 2018. Ms. Valdez has family in the Dominican Republic, and her father owns property there. Ms. Valdez's father has asked her to assist him with some necessary maintenance to the properties before she is incarcerated, as he is too ill to travel or to perform these tasks himself. Ms. Valdez will be available by cell phone for calls with Probation

during her travel, if requested, and will provide her itinerary and address where she will be staying to Probation.

This Court has previously allowed Ms. Valdez to travel to New York, New Hampshire, Puerto Rico, and the Dominican Republic. Her travel was uneventful. She has abided by all conditions of her release.

WHEREFORE, the Defendant, Ileana Valdez, respectfully moves that this Court enter an Order permitting her to travel to the Dominican Republic from February 18 until February 28, 2018, to assist her father with maintaining his property, as he is too infirm to travel or to do the work himself.

Respectfully submitted,

ILEANA VALDEZ  
By her attorney

/s/ Hank Brennan  
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Dated: February 13, 2018

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on or before the above date.

/s/ Hank Brennan

Hank Brennan